

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEUTSCHE LEASING USA, INC., )  
                                    )  
Plaintiff,                     )  
                                    ) Case No.: 18 cv 07982  
v.                              )  
                                    )  
INTERNATIONAL IRON, LLC and JON M. )  
HALL, JR., INDIVIDUALLY,        )  
                                    )  
Defendants.                     )  
                                    )

**PLAINTIFF'S PRELIMINARY STATUS REPORT**

Plaintiff DEUTSCHE LEASING USA, INC. ("DL USA"), by its attorneys Vincent T. Borst and Teresa A. Minnich of Robbins Salomon & Patt, Ltd. presents its Preliminary Status Report to the Court as follows:

**I.     NATURE OF THE CASE:**

**a. Attorneys:**

- i. For Plaintiff: Vince T. Borst and Teresa A. Minnich of Robbins Salomon & Patt, Ltd., 180 N. LaSalle St., Ste. 3300, Chicago, Illinois 60601.
- ii. For Defendants: Defendants will obtain local counsel.

**b. Basis for Federal Diversity Jurisdiction:**

- i. Plaintiff DL USA is a Delaware corporation with its principal place of business at 190 S. LaSalle Street, Suite 2150, Chicago, Illinois 60603.
- ii. Defendant International Iron is a Florida limited liability company with its principal place of business at 2325 Clark Street, Apopka, Florida 32703.

The members of International Iron are Hall, a citizen of the State of Florida, and Cindy Page, also a citizen of the State of Florida.

iii. Defendant Hall is an individual and a citizen of the State of Florida.

**c. Nature of Claims:**

- i. Count I of the Complaint: DL USA alleges that International Iron breached the Floor Plan Financing Agreement No. 100-0010978, dated October 19, 2015, by failing to make timely monthly interest and other payments.
- ii. Count II of the Complaint: DL USA alleges that it is entitled to recover as against Hall pursuant to the terms of the Personal Guaranty between Hall and DL USA, as a result of International Iron's breach of the Floor Plan Financing Agreement No. 100-0010978.
- iii. Counterclaims: There are no counterclaims at present.

**d. Legal and Factual Issues:**

- i. Plaintiff DL USA: The legal and factual issues will include the terms and interpretation of the Floor Plan Financing Agreement No. 100-0010978 and the Personal Guaranty, Defendants' breach of those documents, and Plaintiff's damage resulting from those breaches.
  - ii. Defendants: Defendants accepted service of the Complaint on December 10, 2018, through their Florida counsel. Accordingly, their Answers are due on February 8, 2019.
- e. Relief Sought:** Plaintiff seeks \$1,174,496.51, plus interest from the date of default.

**II. PENDING MOTION AND CASE PLAN**

- a.** The initial status hearing is scheduled for January 31, 2019 at 9:00 a.m.
- b.** Defendants accepted service of the Complaint on December 10, 2018, through their Florida counsel. Accordingly, their Answers are due on February 8, 2019.

**DEUTSCHE LEASING USA, INC.**

By: /s/ *Teresa A. Minnich*

One of its attorneys

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**CERTIFICATE OF SERVICE**

The undersigned certifies that he/she served the foregoing **Plaintiff's Preliminary Status Report**, upon the following person(s) entitled to notice in this cause:

C. Andrew Roy  
Winderweedle, Haines, Ward & Woodman, P.A.  
329 Park Avenue North, Second Floor  
PO Box 880  
Winter Park, Florida 32790-0880  
[aroy@whww.com](mailto:aroy@whww.com)

by e-mail to the address listed above on January 25, 2019.

/s/ Teresa A. Minnich \_\_\_\_\_